

Exhibit A

From: Data at Voter Reference Foundation <data@voterreferencefoundation.com>

Sent: Thursday, June 27, 2024 1:43 PM

To: SEC-DL-Elections Inquiries <Election@sec.state.ma.us>

Cc: Data at Voter Reference Foundation <data@voterreferencefoundation.com>

Subject: Voter registration data

Good afternoon,

Please find the attached request for voter registration data.

Please let me know if anything additional is needed to process the request.

Thank you,

Kristina Kidd

Operations Manager

Voter Reference Foundation

844-302-2109 (Office)

data@voterreferencefoundation.com



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Secretary of the Commonwealth
Elections Division
1 Ashburton Place, Room 1705
Boston, MA 02108
Email: elections@sec.state.ma.us

Dear Elections Official,

Our organization, Voter Reference Foundation (“VRF”), respectfully requests the following:

- 1) A current copy of the Massachusetts voter registration data from the central registry of voters; and
- 2) Voter registration data for all voters removed or canceled from any voter list (e.g. active list, inactive list, suspended list, purged list, deleted list, etc.) between November 8, 2022, and present date, along with voting history/credit data for each voter that voted in the November 8, 2022, general election, including the method of voting (election day polling place, absentee, early, etc.), and the voting jurisdiction the vote occurred in.

This request is made under the National Voter Registration Act of 1993, 52 U.S.C. § 20501, *et. seq.* (the “NVRA”), and specifically 52 U.S.C. § 20507(i), which requires the public disclosure of all records concerning the implementation of state programs and activities for ensuring the accuracy and currency of voter lists, including the lists themselves. *Pub. Int. Legal Found., Inc. v. Bellows*, 92 F.4th 36, 49 (1st Cir. 2024).

Additionally, the NVRA preempts state law prohibitions that conflict with its purposes (such as bans on election-related uses or online publication). *Id.* at 53–56; *Voter Reference Foundation, LLC v. Torrez*, No. CIV 22-0222 JB/KK, 2024 WL 1347204, 2024 U.S. Dist. LEXIS 58803, at *453–54 (D.N.M. Mar. 29, 2024).

Please provide the records in electronic format, either in the original file format, or as a CSV, Excel, TXT or PDF file, by email or an online file hosting service (such as Dropbox).

You may reply to us with the documents or with any questions at data@voterreferencefoundation.com. We appreciate your prompt assistance in providing these records.

Respectfully,

Kristina Kidd
Operations Manager

Voter Reference Foundation
1901 Butterfield Rd
Suite 920
Downers Grove, IL 60515
Email: data@voterreferencefoundation.com

